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12
                          UNITED STATES DISTRICT COURT
13
                     FOR THE CENTRAL DISTRICT OF CALIFORNIA
14
    UNITED STATES OF AMERICA,
                                         No. CR 2:18-00172(A)-GW
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              Plaintiff,
                                         [FINAL] JOINT PROPOSED VERDICT
16
                                         FORM
                   v.
17
                                                        February 25, 2025
                                         Trial Date:
                                         Trial Time:
                                                        8:00 a.m.
    MICHAEL LERMA, et al.,
18
                                                        Courtroom of the
                                         Location:
              Defendants.
                                                        Hon. George H. Wu
19
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         Plaintiff United States of America, by and through its counsel
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    of record, the Acting United States Attorney for the Central District
22
    of California, and Assistant United States Attorneys Kyle W. Kahan,
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Kellye Ng, and Jason A. Gorn, ar	nd defendant Michael Lerma, by and
through his counsel of record Ma	arri Derby and Joel M. Furman,
defendant Carlos Gonzalez, by ar	nd through his counsel of record
Richard G. Novak and Kenneth Mil	ller, defendant Juan Sanchez, by and
through his counsel of record Ch	narles Diamond, Amy Lucas, Rachel H.
Lee, and Richard P. Lasting, and	d defendant Jose Valencia Gonzalez, by
and through his counsel of recor	rd Shaun Khojayan and Daniel Nardoni,
hereby submit their [Final] Joir	nt Proposed Verdict Form in the above-
captioned case.	
Dated: March 26, 2025	Respectfully submitted,
	JOSEPH T. MCNALLY Acting United States Attorney
	LINDSEY GREER DOTSON Assistant United States Attorney Chief, Criminal Division
	/s/ KYLE W. KAHAN KELLYE NG JASON A. GORN Assistant United States Attorneys Attorneys for Plaintiff UNITED STATES OF AMERICA
	(with email authorization) MARRI DERBY JOEL M. FURMAN Attorneys for Defendant MICHAEL LERMA

1		
2	Dated: March 26, 2025	(with email authorization)
3		RICHARD G. NOVAK
4		KENNETH MILLER Attorneys for Defendant
5		CARLOS GONZALEZ
6		
7	Dated: March 26, 2025	(with email authorization)
8		CHARLES DIAMOND AMY LUCAS RACHEL H. LEE
10		RICHARD P. LASTING Attorneys for Defendant
11		JUAN SANCHEZ
12		
13	Dated: March 26, 2025	
14		(with email authorization)
15		SHAUN KHOJAYAN DANIEL NARDONI
16		Attorneys for Defendant JOSE VALENCIA GONZALEZ
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UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA UNITED STATES OF AMERICA, No. CR 2:18-00172(A)-GW Plaintiff, VERDICT FORM V. MICHAEL LERMA, et al., Defendants.

1 COUNT ONE Racketeer Influenced and Corrupt Organizations ("RICO") Conspiracy 2 3 ALL DEFENDANTS 4 5 COUNT ONE - DEFENDANT MICHAEL LERMA: 6 1. We, the jury in the above-captioned case, unanimously find 7 the defendant MICHAEL LERMA (check one): 8 NOT GUILTY 9 GUILTY 10 of RICO Conspiracy as charged in Count One of the First Superseding 11 Indictment. 12 If your response to Question 1 is Guilty, you must also answer 13 14 Question 1a. If your response to Question 1 is Not Guilty, do not 15 answer Question 1a and proceed to Question 2. 16 17 In order to find defendant MICHAEL LERMA quilty as to Count One, 18 you must have unanimously found that he knew or contemplated that one 19 or more members of the conspiracy would commit at least two (or more) 20 acts of racketeering in furtherance of the conspiracy and you must 21 unanimously agree on those same two (or more) racketeering acts. 22 // // 23 24 // 25 // 26 // 27 // 28 //

1	la. We, the jury in the above-captioned case, unanimously find
2	that defendant MICHAEL LERMA knew or contemplated that one or more
3	members of the conspiracy would engage in a pattern of racketeering
4	activity consisting of at least two or more of the following crimes
5	(select all that apply):
6	Murder
7	Robbery
8	Extortion
9	Drug Trafficking
10	
11	(Proceed to Question 2.)
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1	COUNT ONE - DEFENDANT CARLOS GONZALEZ:
2	2. We, the jury in the above-captioned case, unanimously find
3	the defendant CARLOS GONZALEZ (check one):
4	NOT GUILTY
5	GUILTY
6	of RICO Conspiracy as charged in Count One of the First Superseding
7	Indictment.
8	
9	If your response to Question 2 is Guilty, you must also answer
10	Question 2a. If your response to Question 2 is Not Guilty, do not
11	answer Question 2a and proceed to Question 3.
12	
13	In order to find defendant CARLOS GONZALEZ guilty as to Count
14	One, you must have unanimously found that he knew or contemplated
15	that one or more members of the conspiracy would commit at least two
16	(or more) acts of racketeering in furtherance of the conspiracy <u>and</u>
17	you must unanimously agree on those same two (or more) racketeering
18	acts.
19	2a. We, the jury in the above-captioned case, unanimously find
20	that defendant CARLOS GONZALEZ knew or contemplated that one or more
21	members of the conspiracy would engage in a pattern of racketeering
22	activity consisting of at least two or more of the following crimes
23	(select all that apply):
24	Murder
25	Robbery
26	Extortion
27	Drug Trafficking
28	(Proceed to Question 3.)

1	COUNT ONE - DEFENDANT JUAN SANCHEZ:
2	3. We, the jury in the above-captioned case, unanimously find
3	the defendant JUAN SANCHEZ (check one):
4	NOT GUILTY
5	GUILTY
6	of RICO Conspiracy as charged in Count One of the First Superseding
7	Indictment.
8	
9	If your response to Question 3 is Guilty, you must also answer
10	Question 3a. If your response to Question 3 is Not Guilty, do not
11	answer Question 3a and proceed to Question 4.
12	
13	In order to find defendant JUAN SANCHEZ guilty as to Count One,
14	you must have unanimously found that he knew or contemplated that one
15	or more members of the conspiracy would commit at least two (or more)
16	acts of racketeering in furtherance of the conspiracy <u>and</u> you must
17	unanimously agree on those same two (or more) racketeering acts.
18	
19	3a. We, the jury in the above-captioned case, unanimously find
20	that defendant JUAN SANCHEZ knew or contemplated that one or more
21	members of the conspiracy would engage in a pattern of racketeering
22	activity consisting of at least two or more the following crimes
23	(select all that apply):
24	Murder
25	Robbery
26	Extortion
27	Drug Trafficking
28	(Proceed to Question 4.)

1	COUNT ONE - DEFENDANT JOSE VALENCIA GONZALEZ:
2	4. We, the jury in the above-captioned case, unanimously find
3	the defendant JOSE VALENCIA GONZALEZ (check one):
4	NOT GUILTY
5	GUILTY
6	of RICO Conspiracy as charged in Count One of the First Superseding
7	Indictment.
8	
9	If your response to Question 4 is Guilty, you must also answer
10	Question 4a. If your response to Question 4 is Not Guilty, do not
11	answer Question 4a and proceed to Question 5.
12	In order to find defendant JOSE VALENCIA GONZALEZ guilty as to
13	Count One, you must have unanimously found that he knew or
14	contemplated that one or more members of the conspiracy would commit
15	at least two (or more) acts of racketeering in furtherance of the
16	conspiracy <u>and</u> you must unanimously agree on those same two (or more)
17	racketeering acts.
18	
19	4a. We, the jury in the above-captioned case, unanimously find
20	that defendant JOSE VALENCIA GONZALEZ knew or contemplated that one
21	or more members of the conspiracy would engage in a pattern of
22	racketeering activity consisting of at least two or more of the
23	following crimes (select all that apply):
24	Murder
25	Robbery
26	Extortion
27	Drug Trafficking
28	(Proceed to Question 5.)

COUNT SEVEN Violent Crime in Aid of Racketeering and/or Aiding and Abetting (First-Degree Murder) ALL DEFENDANTS COUNT SEVEN - DEFENDANT MICHAEL LERMA: We, the jury in the above-captioned case, unanimously find 5. the defendant MICHAEL LERMA (check one): NOT GUILTY GUILTY as charged in Count Seven of the First Superseding Indictment. (Proceed to Question 6.)

1	COUNT SEVEN - DEFENDANT CARLOS GONZALEZ:	
2	6. We, the jury in the above-captioned case, unanimously fin	d
3	the defendant CARLOS GONZALEZ (check one):	
4	NOT GUILTY	
5	GUILTY	
6	as charged in Count Seven of the First Superseding Indictment.	
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8	(Proceed to Question 7.)	
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1	COUNT SEVEN - DEFENDANT JUAN SANCHEZ:
2	7. We, the jury in the above-captioned case, unanimously find
3	the defendant JUAN SANCHEZ (check one):
4	NOT GUILTY
5	GUILTY
6	as charged in Count Seven of the First Superseding Indictment.
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8	(Proceed to Question 8.)
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1	COUNT SEVEN - DEFENDANT JOSE VALENCIA GONZALEZ:
2	8. We, the jury in the above-captioned case, unanimously find
3	the defendant JOSE VALENCIA GONZALEZ (check one):
4	NOT GUILTY
5	GUILTY
6	as charged in Count Seven of the First Superseding Indictment.
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8	(Proceed to Question 9.)
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COUNT EIGHT First-Degree Murder Within the Special Maritime and Territorial Jurisdiction of the United States ALL DEFENDANTS COUNT EIGHT - DEFENDANT MICHAEL LERMA: We, the jury in the above-captioned case, unanimously find 9. the defendant MICHAEL LERMA (check one): NOT GUILTY ____ GUILTY as charged in Count Eight of the First Superseding Indictment. (Proceed to Question 10.)

1	COUNT EIGHT - DEFENDANT CARLOS GONZALEZ:
2	10. We, the jury in the above-captioned case, unanimously find
3	the defendant CARLOS GONZALEZ (check one):
4	NOT GUILTY
5	GUILTY
6	as charged in Count Eight of the First Superseding Indictment.
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8	(Proceed to Question 11.)
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1	COUNT EIGHT - DEFENDANT JUAN SANCHEZ:
2	11. We, the jury in the above-captioned case, unanimously find
3	the defendant JUAN SANCHEZ (check one):
4	NOT GUILTY
5	GUILTY
6	as charged in Count Eight of the First Superseding Indictment.
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8	(Proceed to Question 12.)
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1	COUNT EIGHT - DEFENDANT JOSE VALENCIA GONZALEZ:
2	12. We, the jury in the above-captioned case, unanimously find
3	the defendant JOSE VALENCIA GONZALEZ (check one):
4	NOT GUILTY
5	GUILTY
6	as charged in Count Seven of the First Superseding Indictment.
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8	(Proceed to Question 13.)
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1 COUNT TEN 2 Drug Trafficking Conspiracy 3 Defendants MICHAEL LERMA and JOSE VALENCIA GONZALEZ 4 5 COUNT TEN - DEFENDANT MICHAEL LERMA: 6 13. We, the jury in the above-captioned case, unanimously find 7 the defendant MICHAEL LERMA (check one): 8 NOT GUILTY 9 GUILTY 10 as charged in Count Ten of the First Superseding Indictment. 11 If your response to Question 13 is Guilty, you must also answer 12 13 Question 14. If your response to Question 13 is Not Guilty, do not 14 answer Question 14 and proceed to Question 15. 15 16 14. We, the jury in the above-captioned case, having found 17 defendant MICHAEL LERMA quilty of Count 10, further unanimously find 18 it was reasonably foreseeable that the overall drug conspiracy would 19 involve the following controlled substance(s) (select all that 20 apply): 21 HEROIN 22 METHAMPHETAMINE 23 as charged in Count Ten of the First Superseding Indictment. 24 25 (Proceed to Question 15.) 26 27

1	COUNT TEN - DEFENDANT JOSE VALENCIA GONZALEZ:
2	15. We, the jury in the above-captioned case, unanimously find
3	the defendant JOSE VALENCIA GONZALEZ (check one):
4	NOT GUILTY
5	GUILTY
6	as charged in Count Ten of the First Superseding Indictment.
7	
8	If your response to Question 15 is Guilty, you must also answer
9	Question 16. If your response to Question 15 is Not Guilty, do not
10	answer Question 16 and proceed to Question 17.
11	
12	16. We, the jury in the above-captioned case, having found
13	defendant JOSE VALENCIA GONZALEZ guilty of Count 10, further
14	unanimously find it was reasonably foreseeable that the overall drug
15	conspiracy would involve the following controlled substance(s)
16	(select all that apply):
17	HEROIN
18	METHAMPHETAMINE
19	as charged in Count Ten of the First Superseding Indictment.
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22	(Proceed to Question 17.)
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COUNT SEVENTEEN Felon in Possession of a Firearm and Ammunition Defendant JOSE VALENCIA GONZALEZ 17. We, the jury in the above-captioned case, unanimously find defendant JOSE VALENCIA GONZALEZ (check one): NOT GUILTY GUILTY as charged in Count Seventeen of the First Superseding Indictment. (Proceed to Question 18.)

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COUNT EIGHTEEN Felon in Possession of a Firearm and Ammunition Defendant CARLOS GONZALEZ We, the jury in the above-captioned case, unanimously find 18. defendant CARLOS GONZALEZ (check one): NOT GUILTY GUILTY as charged in Count Eighteen of the First Superseding Indictment. (Proceed to Question 19.)

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1	COUNT NINETEEN
2	Felon in Possession of a Firearm and Ammunition
3	Defendant JUAN SANCHEZ
4	
5	19. We, the jury in the above-captioned case, unanimously find
6	defendant JUAN SANCHEZ (check one):
7	NOT GUILTY
8	GUILTY
9	as charged in Count Nineteen of the First Superseding Indictment.
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L2	
L3	(77)
L4	(The foreperson should now sign and date this verdict form.)
L5	DAMED.
L6	DATED:, 2025, at Los Angeles, California.
L7	FOREPERSON OF THE JURY
L8	FOREFERSON OF THE JUNI
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